



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 15, 2015

BY ECF

The Honorable Loretta A. Preska
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Israel Reyes, et al.*, S1 14 Cr. 483 (LAP)

Dear Chief Judge Preska:

The Government writes regarding scheduling in this matter.

The Government is in continuing plea discussions with the remaining four defendants. Under the current schedule, defense motions are due tomorrow,¹ and a conference is scheduled for Tuesday, April 21st.

With the consent of counsel for the remaining defendants and after consulting with Chambers, the Government respectfully requests that the motion deadline and the conference be adjourned and that the Court set the following schedule:

- Defense motions due May 1, 2015
- Government opposition due May 22, 2015
- Oral argument/status conference June 9, 2015 at 11:30 a.m.

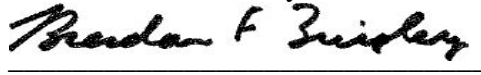
Further, with the consent of counsel for the remaining defendants, the Government respectfully requests that time be excluded under the Speedy Trial Act until June 9, 2015. The requested continuance will allow the parties time to continue plea discussions and allow the defendants time to contemplate and file any motions. The Government submits that, pursuant to

¹ See Order, *United States v. Reyes*, 14 Cr. 483 (S.D.N.Y. Mar. 4, 2015), ECF No. 79 (extending the time for the filing of defense motions to March 16, 2015 and excluding time through the date); Order, *United States v. Reyes*, 14 Cr. 483 (S.D.N.Y. Mar. 11, 2015), ECF No. 89 (granting defendant Reyes' request to extend the filing deadline by one month and excluding time through the new filing deadline).

18 U.S.C. § 3161(h)(7)(A), the ends of justice served by granting this continuance outweigh the best interests of the defendants and the public in a speedy trial.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: 

Brendan F. Quigley
Assistant United States Attorney
Southern District of New York
Tel: (212) 637-2190